

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

SUBRANNI ZAUBER LLC
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Atlantic City, NJ 08401
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Attorneys for Debtor
By: Scott M. Zauber, Esq. SZ6086

In re: : IN BANKRUPTCY
: CHAPTER 13
ROBERT PORTELLA :
: CASE NO. 14-21976
: Debtor :
: HEARING DATE: July 10, 2014 10:00 am
: ORAL ARGUMENT WAIVED

NOTICE OF MOTION TO CONTINUE AUTOMATIC STAY

TO:
Atlantic County Improvement
Authority
5909 Main Street
Mays Landing, NJ 08330

Isabel Balboa
Chapter 13 Standing Trustee
Cherry Tree Corporate Center
535 Route 38, Suite 580
Cherry Hill, NJ 08002

Wells Fargo Home Mortgage
PO Box 10335
Des Moines, IA 50306-0335

Reverse Mortgage Solutions, Inc.
2727 Spring Creek Drive
Spring, TX 77373

United States Trustee's Office
**One Newark Center, Suite
2100**
Newark, NJ 07102

PLEASE TAKE NOTICE that on the 10th day of July 2014 at 10:00 a.m. in the forenoon or as soon thereafter as counsel may be heard, the undersigned attorney for Debtor will move before the Honorable Gloria M. Burns, United States Bankruptcy Judge, or the Judge presiding on that day, at the United States Bankruptcy Court located at Mitchell H. Cohen Courthouse, 400 Cooper Street, Camden, New Jersey 08101 for an Order Continuing the Automatic Stay Pursuant to §362(c)(3)(B).

Pursuant to the local Rules of Bankruptcy Procedure, any opposition to this motion must be made in writing, filed with the Court, and served on the undersigned counsel at least 7 days prior to the return date hereof.

Pursuant to the local Rules of Bankruptcy Procedure, the undersigned counsel requests that this matter be heard on the papers unless opposition is filed or oral argument requested by the Court.

SUBRANNI ZAUBER LLC
Attorneys for Debtor

Dated: June 10, 2014

BY: /s/ Scott M. Zauber, Esq.
Scott M. Zauber, Esq.